

Message

From: Dourson, Michael [dourson.michael@epa.gov]
Sent: 11/8/2017 1:41:42 PM
To: Sands, Jeffrey [sands.jeffrey@epa.gov]
CC: Baptist, Erik [baptist.erik@epa.gov]
Subject: RE: Endangered Species

Jeff

I will be there at 11:30. Lunch also sounds reasonable.

Michael

From: Sands, Jeffrey
Sent: Wednesday, November 8, 2017 8:39 AM
To: Dourson, Michael <dourson.michael@epa.gov>
Cc: Baptist, Erik <baptist.erik@epa.gov>
Subject: Re: Endangered Species

Hey there,

How does a cup of coffee at around 11:30am at Timgad Cafe (lower level outside between North and South building) sound to catch up on ESA? I have a lunch with USDA (marketing and regulatory) at 12:15 in Ronald Reagan building that you are more than welcome to join for as long as you can stay. May be a beneficial connection.

Let me know if any/all of that sounds like something your interested in. I am available at 202-697-3087 if you need anything before then. Otherwise, I'll count on seeing you at the coffee shop.

JmS

Sent from my iPhone

On Nov 8, 2017, at 8:23 AM, Dourson, Michael <dourson.michael@epa.gov> wrote:

Jeff

Wonderful. I am free between 11 am and 1 pm over in EPA east. Somewhere for lunch?

Cheers!

Michael

From: Sands, Jeffrey
Sent: Tuesday, November 7, 2017 8:22 PM
To: Dourson, Michael <dourson.michael@epa.gov>
Cc: Jackson, Ryan <jackson.ryan@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>
Subject: Re: Endangered Species

If helpful, I am free tomorrow and Thursday morning until 11am. Would be happy to drop by your office or host in 2415 to talk through options.

Sent from my iPhone

On Nov 7, 2017, at 7:55 PM, Dourson, Michael <dourson.michael@epa.gov> wrote:

Ryan

You and Administrator Pruitt already know that the ESA is an exceedingly complex law that is perhaps even harder to implement. Briefly, this is because pesticides are legally allowed to be used throughout the country, but endangered species are normally more localized. Because of this complexity, the NAS suggested a 3 step process to be shared among several agencies.

The Biological Evaluations (BEs) completed by our EPA staff are step 1 and perhaps step 2 of the NAS process, and are among the most complex assessments I have ever seen (and I have been doing stuff like this for quite some time). EPA's BEs take into consideration pesticide exposures up to the legal label and assess the hazard to hundreds of species. These first two steps are designed to be conservative, and they are. In contrast, step 2 and perhaps 3, the Biological Opinions (BOps) by the services, are intended to more realistically reflect exposures. Briefly, since endangered species are more localized, they may be in an area with little to no pesticide exposure, so they should not be at risk in a BOp.

Dave Bernhardt of DOI is willing to share some of his staff's thoughts on our BEs during the development of their BOps. We had the opportunity to look at parts of DOI's draft BOps and have perhaps similar insights. He would like to send us a letter from DOI to EPA expressing these thoughts. Would you have a wee bit of time over the next two days to discuss options?

Cheers!

Michael

Sent from my iPad

On Nov 7, 2017, at 5:41 PM, Dourson, Michael <dourson.michael@epa.gov> wrote:

Ryan

Do you have time later today or tomorrow to talk about a conversation I had with Dave Barnhardt of DOI?

Cheers!

Michael